## Remarks

Claims 1-20 remain pending.

A new title of the invention has been provided as requested by the Examiner.

FIG. 11 has been amended to include the legend "PRIOR ART" as requested by the Examiner.

The drawings are objected to under 37 CFR 1.83(a) as allegedly failing to show every feature of the invention specified in the claims. In particular, the Examiner asserts that the "means" i.e., the "generation means," "storage means," and "display means," are not displayed in the drawings. In addition, the Examiner asserts that the "information processing apparatus" is not displayed in the drawings. Applicants respectfully disagree with the Examiner's position regarding the drawings.

35 U.S.C. 112, sixth paragraph states:

"An element in a claim for a combination may be expressed as a means or step for performing a specified function without the recital of structure, material, or acts in support thereof, and such claim shall be construed to cover the corresponding structure, material, or acts described in the specification and equivalents thereof."

Accordingly, there is no requirement for the claim term "means" to be explicitly shown in the drawings.

Applicants submit that the various claimed "means" are shown in the drawings. For example, the claimed "generation means" corresponds to the reference relationship information generator 31 depicted in FIG. 1. Likewise, the claimed "storage means" and "display means" correspond to the reference relationship information storage unit 33 and reference relationship information display unit 32, respectively, depicted in FIG. 1.

Further, the "information processing apparatus" corresponds to the reference relationship related module 30 depicted in FIG. 1. Accordingly, since all claim features are clearly illustrated in the drawings, Applicants request withdrawal of the objection to the drawings.

The disclosure is objected to for allegedly failing to "elucidate and fully describe the working features of the instant invention." The Examiner asserts that the "parts of the claimed invention are discussed, yet the interactions and communication between the components are not clearly explained in [a] manner of enabling one of pertinent skill to recreate the instant invention." Applicants respectfully disagree and submit that the instant disclosure provides a full description of the invention that would enable one of pertinent skill in the art to make and use the present invention. FIG. 1 and its corresponding disclosure, for example, provide a clear and detailed description of the "interactions and communication between the components" of the present invention. Further, the design support system illustrated in FIG. 1, taken together with the detailed descriptions of the operational flowcharts illustrated in FIGS. 2, 3, 4A, 4B, 5A, 5B, 6A, and 6B, clearly describe the operation of the present invention in a manner that would enable one of pertinent skill in the art to make and use the present invention. The description of the example reference relationship illustrated in FIG. 7, the example reference relationship information illustrated in FIGS. 8A and 8B, the example link information list illustrated in FIG. 9, and the example display for a digital document illustrated in FIG. 10, further solidify the completeness of the instant disclosure. Accordingly, Applicants request withdrawal of the Examiner's objections to the disclosure.

Claims 1-20 are rejected under 35 U.S.C. 112, first paragraph as allegedly failing to comply with the enablement requirement. The Examiner asserts that the claimed "information processing apparatus" has "not been described in the disclosure nor has a figure been depicted in the drawings." Applicants direct the Examiner's attention to the reference relationship related module 30 depicted in FIG. 1 and described throughout the specification, which corresponds to the claimed "information processing apparatus." The Examiner also asserts that "no correlation or interaction between the claimed parts has been shown or taught." As discussed above, FIG. 1 and its corresponding disclosure, provide a clear and detailed description of the "interactions and communication between the components" of the present invention. The Examiner also states that the manner in which the "generation means" formulates and generates a relationship is not described. The Examiner's attention is directed, for example, to the flowchart of FIG. 2 (and corresponding description), entitled "Process for Generating a Reference Relationship Information from a Digital Document to Geometry Data" and the flowchart of FIG. 3 (and corresponding description), entitled "Process for Generating A Reference Relationship Information from Geometry Data to a Digital Document." The Examiner also questions "what is considered as reference data and design information." Design information and reference relationship information are discussed in detail throughout the disclosure. An illustrative example of design information and reference relationship information can be found, for example, in FIG. 7 and its corresponding description. The Examiner also alleges that the "process/means used by the 'storage means' for storing, receiving/transferring data is not clearly disclosed for one or ordinary skill to make and/or use." Applicants disagree and submit that the storage of data is a basic concept in

storage required by the present invention. The Examiner further states that "the connection of the 'display means' with the other means has not been established." The Examiner's attention is directed to the digital document display unit 12, geometry data display unit 22, and reference relationship information display unit 32 depicted in FIG. 1, which clearly shows how each of the display units are connected within the design support system. Additional information regarding the display/use of data is provided, for example, in the flowcharts of FIGS. 4A, 4B, 5A, 5B, 6A, 6B (and corresponding description). The Examiner also alleges that the structure and communication between the various modules of claim 9 are not adequately described. The Examiner's attention is directed to the reference relationship information generator 31, reference relationship information storage unit 33. and reference relationship information display unit 32 depicted in FIG. 1 (and corresponding description).

Claims 1-20 are rejected under 35 U.S.C. 102(e) over Harrison et al. (US 6,611,725), hereafter "Harrison." This rejection is defective because Harrison fails to teach or suggest each and every feature set forth in the claims as required by 35 U.S.C. 102.

Regarding independent claim 1 (and similarly independent claims 5, 7, 9, 13, 14, 17, 19, and 20), Harrison fails to teach or suggest the generation of "bi-directional relationship information representing a correlation between design information used for a design operation, and geometry data that is obtained by the design operation."

Accordingly, since Harrison fails to teach or suggest each and every feature set forth in the claims, Applicants submit that claims 1-20 are allowable.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

Dated: 12/28/04

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